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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

VIOLATIONS: 18 U.S.C. § 922(b)(5)
18 U.S.C. § 922(l)
18 U.S.C. § 922(o)
26 U.S.C. § 5861(d)
26 U.S.C. § 5861(f)

v.

CHASE FARMER,

Defendant.

Case: 2:22-cr-20678
Judge: Drain, Gershwin A.
MJ: Altman, Kimberly G.
Filed: 12-21-2022
USA VS SEALED MATTER (DP)

INDICTMENT

THE GRAND JURY CHARGES:

COUNT ONE

Illegal Importation of a Firearm
18 U.S.C. § 922(l)

From on or about November 17, 2020 to on or about May 1, 2021, in the Eastern District of Michigan, and elsewhere, the defendant, CHASE FARMER, knowingly and without authorization by the Attorney General as provided in 18 U.S.C. § 925(d), imported and brought into the United States firearms, that is, Glock conversion devices or machineguns as defined under the National Firearms Act, 26 U.S.C. §§ 5845(a) and 5845(b), in violation of Title 18, United States Code, Sections 922(l) and 924(a)(1)(C).

COUNT TWO

Possession of Unregistered Machinegun
26 U.S.C. § 5861(d)

From on or about February 8, 2021 to on or about September 27, 2022, in the Eastern District of Michigan, the defendant, CHASE FARMER, knowingly possessed Glock conversion devices, that is, machineguns as defined under the National Firearms Act, 26 U.S.C. §§ 5845(a) and 5845(b), not registered to him in the National Firearms Registration and Transfer Record, in violation of Title 26, United States Code, Sections 5841, 5861(d), and 5871.

COUNT THREE

Illegal Transfer of a Machine Gun
18 U.S.C. § 922(o)

From on or about February 8, 2021 to on or September 27, 2022, in the Eastern District of Michigan, the defendant, CHASE FARMER, knowingly transferred Glock conversion devices, that is, machineguns as defined under the National Firearms Act, 26 U.S.C. §§ 5845(a) and 5845(b), in violation of Title 18, United States Code, Sections 922(o) and 924(a)(2).

COUNT FOUR

Failure by Federally Licensed Dealer to Keep Proper Records
18 U.S.C. § 922(b)(5)

From on or about February 8, 2021 to on or about September 27, 2022, in the Eastern District of Michigan, the defendant, CHASE FARMER, being a licensed dealer of firearms, within the meaning of Chapter 44, Title 18, United States Code, did willfully sell and deliver to another person, a firearm, without noting in the defendant's records required to be kept by law pursuant to Title 18, United States Code, Section 923, the name of said purchaser of the firearm, in violation of Title 18, United States Code, Sections 922(b)(5) and 924(a)(1)(D).

FORFEITURE ALLEGATIONS

26 U.S.C. § 5872

The allegations of Counts One through Four of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America of certain property in which the defendant, CHASE FARMER, has an interest, pursuant to the provisions of Title 26, United States Code, Section 5872. Upon conviction of the offense alleged in this Information, the defendant shall forfeit to the United States any firearm involved in or used in the violation of Title 26, United States Code, Sections 5861(d).

THIS IS A TRUE BILL

s/ Grand Jury Foreperson

GRAND JURY FOREPERSON

DAWN N. ISON
United States Attorney

s/ Brandy R. McMillion
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Dated: December 21, 2022

United States District Court Eastern District of Michigan	Criminal Case Cover Sheet	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

Companion Case Information	Companion Case Number:
This may be a companion case based upon LCrR 57.10 (b)(4) ¹ :	Judge Assigned:
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials: <u>DNP</u>

Case Title: USA v. CHASE FARMER

County where offense occurred : Macomb

Check One: ☒ Felony ☐ Misdemeanor ☐ Petty

☒ Indictment/___ Information --- no prior complaint.
☐ Indictment/___ Information --- based upon prior complaint [Case number: _____]
☐ Indictment/___ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

Superseding Case Information

Superseding to Case No: _____ Judge: _____

- ☐ Corrects errors; no additional charges or defendants.
☐ Involves, for plea purposes, different charges or adds counts.
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.

December 21, 2022
Date


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¹ Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.